

REMARKS

INTRODUCTION:

In accordance with the foregoing, claims 31 and 32 have been canceled and claim 1 has been amended. No new matter is being presented, and approval and entry are respectfully requested.

Claims 1-8, 17-25, 27, 28 and 30 are pending and under consideration. Reconsideration is respectfully requested.

NON-PRIOR ART REJECTIONS

In the Office Action mailed July 13, 2007, starting on page 4, claims 1-8, 25, 28, 31 and 32 were rejected under 35 U.S.C. § 101. By this amendment, it is submitted that independent claims 1 and 17 produce tangible results. Specifically, claim 1 recites "a generating unit generating and storing analytical data" at line 8 and it is submitted that storing data is a tangible result. Claim 17 recites "generating analytical data ... and storing said analytical data" at lines 8-10 and it is submitted that storing analytical data is a tangible result.

In view of the above, it is submitted that independent claims 1, dependent claims 2-8, which depend therefrom, produce tangible results and withdrawal of the rejection is respectfully requested. Dependent claims 27, 28, and 30 depend on claim 17 and for the reasons submitted above, it is submitted that these claims produce a tangible result and withdrawal of the rejection is respectfully rejected. Furthermore, by this amendment, claims 31 and 32 have been cancelled, thereby rendering rejection thereof moot. Withdrawal of rejection of these claims is respectfully rejected.

PRIOR ART REJECTIONS

In the Office Action, starting on page 4, claims 1-3, 5, 7-11, 13, 15-19, 21, 23-25, 27, 28, 30 and 31 were rejected under 35 U.S.C. § 102(b) as being anticipated by Muuss ("Combinatorial Solid Geometry, Boundary Representations, and Non-Manifold Geometry"); and claims 4, 6, 12, 14, 20 and 22 were rejected under 35 U.S.C. § 103(a) as unpatentable in view of Muuss and Tsap ("Efficient Nonlinear Finite Element Modeling of Nonrigid Objects via Optimization of Mesh Models"). All rejections are traversed below and reconsideration is respectfully requested.

Claim 1 recites an "analysis support apparatus for supporting an apparatus performing an analysis using geometric data to check characteristics of a structure representing by the

geometric data" (emphasis added) at lines 1-3 and "a generating unit generating and storing analytical data formed by at least the obtained analytical conditions and the geometric data corresponding to the specified types of analyses as integrated data" in the last three lines.

In contrast, Muuss discussed the processing of the data of an object using various characteristic data for the object and geometric data used in the analysis. That is, Muuss describes performing analysis on geometric data and does not provide details regarding how to generate the analytical data used in the analysis described. The Office Action cited figures 1 and 2 and pages 2-3 and 6-7 in rejecting claim 1, but did not provide a specific citation to where Muuss disclosed anything that performs the operations of the generating unit.. In addition to pages 6-7 cited in the rejection, the Office Action also referenced page 8 of Muuss in the Response to Arguments appearing on page 3 of the Office Action but no suggestion of a generating unit could be found there either.

After reviewing the portions cited by the Office Action, it is clear that Muuss offers no description of how to **form or store** "integrated data" generated as recited in claim 1. In the Office Action, the Response to Arguments alleged that the

application interface... receives a request for a certain type of analysis for an object... retrieves the geometric object from the geometric database and then either interrogates the object or has the object interrogate itself to retrieve the necessary analytical data. This is all then combined into an "analysis output" which can be sent to the analysis software

in the last five lines of page 3. The Office Action is not clear what, exactly, is being "combined into an 'analysis output'" as alleged in the Office Action. Specifically, Muuss does not describe a combination of data, or a data structure supporting such a combination, but rather a class capable of receiving requests.

In describing the applications interface illustrated in Figure 2, Muuss states:

the BRL-CAD Package... [uses] a broad set of analysis codes which access the same geometric database... [t]hese analyses [sic] cover the spectrum from engineering decision aids, to design validators, to signature prediction codes to the generation of wireframe drawings, to high-resolution image generation from management comprehension and sales advantage

on page 7, lines 11-16. Thus, Muuss provides "a variety of procedural interfaces" (page 8, lines 1-2) that allows "objects to interrogate themselves in a desired way or to convert themselves into the desired representation" (page 8, lines 6-8). Clearly, a combination is not being described, but a conversion from one state (or "representation") to another.

Even if Muuss does disclose the generation of "integrated data" as recited in claim 1, there is nothing to suggest that Muuss stores that "integrated data" as recited in claim 1. Thus, claim 1 is a support apparatus directed to "check[ing] characteristics of [data] structure" and does so by "generating and storing analytical data formed by at least the obtained analytical conditions and the geometric data corresponding to the specified types of analyses as integrated data" (last three lines).

Therefore, it is submitted that applications interface of FIG. 2, which includes a class capable to "interrogate themselves in a desired way or to convert itself into a desired representation" do not anticipate "a generating unit generating and storing analytical data formed by at least the obtained analytical conditions and the geometric data corresponding to the specified types of analyses as integrated data" as recited in claim 1, because Muuss does not teach or suggest combining data elements prior to performing any data modification or analysis on the geometric data.

Claim 17 recites "generating analytical data formed by at least the obtained analytical conditions and the geometric data corresponding to the specified types of analyses as integrated data and storing said analytical data" at lines 8-10.

Therefore, in view of the above, it is submitted, for the reasons submitted above, that independent claims 1 and 17 and dependent claims 2, 3, 5, 7-11, 13, 15-16, 18, 19, 21, 23-25, 27, 28, and 30, which depend therefrom, are patentably distinguishable from Muuss.

Starting on page 7 of the Office Action, claims 4, 6 12, 14, 20 and 22 were rejected under 35 U.S.C. § 103(a) in view of Muuss and Tsap. In addition to what was cited above in Muuss, the Office Action also made reference to section 3.6 of Tsap. After reviewing Tsap, and particularly section 3.6, it is clear that Tsap disclosed uses of mesh sizes in analysis, but did not discuss data structure. Therefore, it is submitted that Muuss and Tsap, individually or in combination, do not teach or suggest what has been claimed in claims 4, 6, 20 and 22.

CONCLUSION

If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

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By: David Moore
David E. Moore
Registration No. 59,047

1201 New York Ave, N.W., 7th Floor
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501